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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OPPOSITION
TO DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
ACQUISITION DOCUMENTS**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal the confidential information in its May 30 Opposition to Defendants' Administrative Motion to
8 File Under Seal Acquisition Documents ("Waymo's Administrative Motion"). Waymo's
9 Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Highlighted in Blue	Defendants
Exhibits A-C to Nardinelli Declaration in Support of the Opposition	Entire Documents	Defendants

13 3. Waymo's Opposition and Exhibits to the supporting Nardinelli declaration contain
14 references to information that Defendants have designated as confidential.

15 4. Waymo partially opposes the merits of sealing certain portions of Defendants'
16 designated material, as detailed in Waymo's Opposition, and expects Defendants to file one or more
17 declarations in accordance with the Local Rules.

18 I declare under penalty of perjury under the laws of the State of California that the foregoing is
19 true and correct, and that this declaration was executed in San Francisco, California, on May 30, 2017.

20 By /s/ Lindsay Cooper

21 Lindsay Cooper

22 Attorneys for WAYMO LLC

23 **SIGNATURE ATTESTATION**

24 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
25 filing of this document has been obtained from Lindsay Cooper.

26 /s/ Charles K. Verhoeven

27 Charles K. Verhoeven